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Via ECF

The Honorable P. Kevin Castel, U.S.D.J.
United States District Court, S.D.N.Y.
500 Pearl Street
New York, NY 10007

Re: *Esther Wilder v. Sarah Hoiland*, Case No. 1:22-cv-01254-PKC
Unopposed Request for Extension of Discovery Schedule

Dear Judge Castel:

We represent Plaintiff Esther Wilder in the above-referenced matter. Pursuant to Your Honor's Individual Rule 1.B, we submit this request for a 60-day extension to the deadline to complete fact discovery, as well as corresponding extensions to the case schedule. The date of the next conference before the Court is September 2, 2022 at 11:00 a.m.

Fact discovery is currently scheduled to be completed by **August 16, 2022**. (ECF No. 13 ¶ 5.) If Plaintiff's requested 60-day extension is granted, the close of fact discovery would be **October 17, 2022**. A Revised Case Management Plan and Scheduling Order reflecting Plaintiff's proposed extension is attached hereto.

As the Court is aware, the parties have been engaged in the District's Mediation Program. While the parties were preparing for mediation, they agreed to extend the dates to respond to written discovery to conserve resources in view of potential settlement. Although the parties have now exchanged written discovery requests and responded to those requests, the parties require additional time to complete their document productions, attempt to resolve disputes regarding written discovery, and take depositions. Thus, Plaintiff seeks a 60-day extension to attempt to resolve these discovery issues and complete fact discovery. This is Plaintiff's first request for an extension to the discovery schedule.

Defendant Sarah Hoiland has stated that she does not oppose this request for an extension, and requested that Plaintiff include the letter attached hereto with Defendant's position.

We thank Your Honor for your consideration on this matter.

Respectfully submitted,

s/ Janet B. Linn

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cc: Defendant Sarah Hoiland via e-mail